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June 2, 2014

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge for the Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *In re American Express Anti-Steering Rules Antitrust Litig.*, 11-md-
2221 (NGG)

Dear Judge Garaufis:

On behalf of objector the Buckeye Institute for Public Policy Solutions (“Buckeye”), in an abundance of caution,¹ I am writing to seek:

(1) pursuant to Local Civil Rule 7.1(d), leave to file an objection that is up to 35 pages in length.

In April, plaintiffs filed a memorandum of law in support of settlement that ran 36 pages long. Dkt. 362. The Court granted them permission to do so. *See* Dkt. 374

¹ It is not clear that under Your Honor’s Individual Rule III.C. (which limits “memoranda of law in support of and in opposition to motions” to 25 pages) is applicable to formal objections. Nonetheless, Buckeye files this motion for belt and suspenders reasons.

(granting letter motion (Dkt. 360)). Buckeye's objection will be filed on May 6. In order to fully address Buckeye's objections, as well as respond to the plaintiffs motions for final approval and fee award, Buckeye believes 35 pages is necessary and economical.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. Schulman', written in a cursive style.

Adam E. Schulman (*pro hac vice*)

Attorney for The Buckeye Institute for Public Policy Solutions

cc: Counsel of Record (via ECF)